



Department of Energy

Oak Ridge Operations
Paducah Site Office
P.O. Box 1410
Paducah, KY 42001
December 4, 1998

Paducah Site Specific Advisory Board
Information Age Park Resource Center
2000 McCracken Boulevard
Paducah, Kentucky 42001

Dear Site Specific Advisory Board Members:

PADUCAH GASEOUS DIFFUSION PLANT SITE SPECIFIC ADVISORY BOARD RECOMMENDATION 98-1, REGARDING VORTEC DRAFT ENVIRONMENTAL ASSESSMENT

At the April 16, 1998, meeting of the Paducah Site Specific Advisory Board (SSAB), the Board conveyed to the Department of Energy (DOE) Recommendation 98-1: "The majority of the members present recommended that the DOE not use a Finding of No Significant Impact (FONSI) to proceed with the Vortec project 30-day pilot test. Instead, the board proposes an Environmental Impact Statement (EIS) that will include cumulative impacts from other sources. This comment was in regard to the review of the draft Vortec EA.

The development of the Vortec EA has been discussed with the board during the intervening period. This EA has become a focus of discussion between DOE Oak Ridge Operations and DOE Headquarters that has resulted in many comments. It is DOE's current position that the EA will concentrate on the demonstration phase of the Vortec unit, with further National Environmental Policy Act (NEPA) documentation to be developed as necessary for the treatment phase of the process.

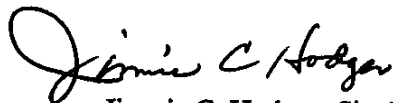
DOE NEPA implementing procedures, 10 CFR 1021.400 state that DOE shall prepare an EA if the proposal does not normally require the preparation of an EIS. On the basis of that EA, DOE shall determine whether to prepare an EIS or a Finding of No Significant Impact (FONSI). Council on Environmental Quality (CEQ) regulations 40 CFR 1501.4(c) state that DOE shall make a determination whether to prepare an EIS based on the EA. Therefore, in accordance with DOE and CEQ regulations, DOE believes that the completed EA will provide a basis to determine if an EIS is required for the Vortec demonstration.

CEQ regulation 1508.7 defines cumulative impacts to be used in the analysis of impacts on the environment. DOE guidance "Recommendations for the Preparation of Environmental Assessments and Environmental Impact Statements" further defines cumulative impacts for DOE NEPA documents. DOE has a policy that cumulative impact analysis should be included in EAs, as well as EISs and accordingly, DOE intends to include a cumulative impact analysis the Vortec demonstration EA.

December 4, 1998

If you have any questions or require additional information, please call W. David Tidwell at (502) 441-6807.

Sincerely,

A handwritten signature in cursive script, reading "Jimmie C. Hodges".

Jimmie C. Hodges, Site Manager
Paducah Site Office

Enclosure